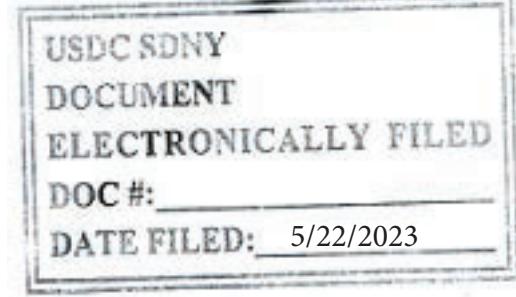


MEMO ENDORSED

AIELLO CANNICK
Your rights • Our business



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May 22, 2023

VIA ECF

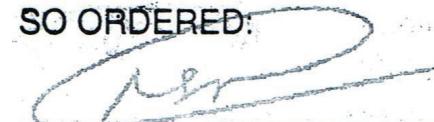
Honorable Nelson S. Roman
United States District Court
Southern District of New York
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Deft's application is DENIED without prejudice to move to modify the bail conditions before the crim duty magistrate judge. Clerk of Court is requested to terminate the motion at ECF No. 78.

Dated: White Plains, NY

May 22, 2023

SO ORDERED:


HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

Dear Judge Roman:

We write to seek the Court's intervention or guidance in a matter regarding Ms. Ayers bail conditions. Ms. Ayers recently obtained employment with Intuit, Inc. Her responsibilities are to provide tax advice and tax expertise to customers. She began her employment with Intuit, Inc. on February 10th, 2023. Given the nature of the job, she does have access to personal information of the clients. Also, in February 2023, Ms. Ayers started a business entitled S&A Consulting which assists limited liability companies with their credit issues. This runs afoul of her bail conditions. While I have a recollection of there being an understanding that she could do taxes as well as operating her travel business, however there is nothing in writing that memorializes that.

Ms. Ayers is 36 years old. She has two young children, ages 8 and 1. She is a single mom. She holds a Master's Degree in Business Administration. She has worked all of her life. She recently sought employment so that she could continue to provide for her children and to maintain her home. In fact, it is imperative that she has an income. However, she does not want to do anything that would be contrary to her bail conditions. Thus, we write in hopes that the Court could fashion a condition or conditions that would allow her to maintain her employment.

Thank you in advance for your consideration in this matter.

Respectfully submitted,

Deveraux L. Cannick

Deveraux L. Cannick

cc: Jeffrey.Coffman@usdoj.gov